

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA,	*	
	*	
Plaintiff,	*	
v.	*	Civil Action No. 22-cv-02448-ELH
	*	
HUMPHREY-STAVROU ASSOCIATES INC.,	*	
<i>et al.</i> ,	*	
	*	
Defendants.	*	

**CONSENT MOTION TO APPROVE THE DISTRIBUTION OF THE
SETTLEMENT FUND TO AGGRIEVED PERSONS**

Through this unopposed motion, Plaintiff United States of America moves the Court to approve the attached distribution of the Settlement Fund to aggrieved persons on the following grounds:

1. On October 19, 2023, the Court entered a Consent Order against Defendants: (a) Humphrey-Stavrou Associates, Inc. (“HSAI”), (b) Pin Oak Elderly Associates, LP, (c) Country View Elderly Associates, LP, (d) Randolph Village Associates LP (collectively, “HSA Defendants”), and Rule 19 Defendants: (a) Avanath Vista Lakes, LLC, (b) Avanath Largo Center, LLC, and (c) CDT SP Henson Creek LLC (collectively “Rule 19 Defendants”). ECF No. 50.

2. The Consent Order resolved the United States’ claims against the HSA Defendants under the Fair Housing Act (“FHA”), 42 U.S.C. § 3604(f)(1)-(f)(3), and the Americans with Disabilities Act (“ADA”), 42 U.S.C. § 12183(a)(1).

3. Paragraph 78 of the Consent Order required HSAI to deposit in an interest-bearing escrow account (“Settlement Fund”) the sum of Sixty Thousand Dollars (\$60,000) for the purpose of paying monetary damages to prospective, current, and former residents of the

Subject Properties deemed by the United States to be aggrieved persons (hereinafter “aggrieved persons”).¹

4. Paragraphs 79 through 89 describe the procedure for disbursements from the Settlement Fund. Paragraph 87 requires the United States to determine which persons are aggrieved and an appropriate damage amount that should be paid to each person from the Settlement Fund. The Defendants waived their right to contest the United States’ determinations. The Consent Order required the United States to inform the Defendants of these determinations and include a copy of the sworn declaration from each aggrieved person, which the United States did on April 18, 2025.

5. Paragraph 88 requires that the United States submit the final recommendation for disbursements from the Settlement Fund to the Court for approval. Attached hereto is Exhibit 1, which identifies the names of the aggrieved persons and the amount of money to be distributed to each person for the Court’s approval.

6. Paragraph 89 provides that within sixty (60) days from the Court’s entry of the Order approving payment to aggrieved persons, HSAI shall deliver to the United States checks payable to the aggrieved persons, or to the aggrieved person’s estate, heir(s) of their estates, or legal guardians if requested by the United States. The United States is required to distribute the check to each aggrieved person – or to the executor of the aggrieved person’s estate, heirs, or guardians, if appropriate – after the United States has received a signed release in the form of Appendix D to the Consent Order. The United States is also required to provide HSAI with a copy of the signed release from each aggrieved person within sixty (60) days after the check is

¹ The interest-bearing account has accrued \$2,270 in interest. For this reason, Ex. 1 reflects a total of \$62,270 to be disbursed to aggrieved persons.

distributed to the aggrieved person.

Wherefore, for all the reasons stated above, the United States requests that the Court approve the distribution of the funds set forth in **Exhibit 1**. A proposed Order is attached.

Dated: May 5, 2025

Respectfully submitted,

KELLY O. HAYES
United States Attorney
District of Maryland

_____/s/_____
KIMBERLY S. PHILLIPS
Bar No. 811611
Assistant United States Attorney
36 S. Charles Street 4th Floor
Baltimore, Maryland 21201
Phone: (410) 209-4900
E-mail: Kimberly.Phillips@usdoj.gov

HARMEET K. DHILLON
Assistant Attorney General

MICHAEL E. GATES
Deputy Assistant Attorney General
Civil Rights Division

CARRIE PAGNUCCO
Chief, Housing and Civil Enforcement Section

_____/s/_____
MICHAEL S. MAURER
Deputy Chief
BETH PEPPER
JENNIFER MCALLISTER
Trial Attorneys
Housing and Civil Enforcement Section
Civil Rights Division
U.S. Department of Justice
4 Constitution Square
150 M Street, N.E., Room 8.109
Washington, DC 20002
Phone: (202) 532-5170
Fax: (202) 514-1116
E-mail: Beth.Pepper@usdoj.gov
E-mail: Jennifer.Mcallister@usdoj.gov

*Attorneys for Plaintiff
United States of America*